

November 3, 2014

VIA E-MAIL AND ECF

The Honorable Denise L. Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1610
New York, NY 10007-1312

MENT
TRONICALL

11/18/2014

Re: FHFA v. Nomura Holding America Inc., No. 11 Civ. 6201 (DLC)

MEMO ENDORSED

Dear Judge Cote:


Plaintiff Federal Housing Finance Agency ("FHFA") and Defendants in the above-captioned Action (collectively, the "Parties") write concerning the Court's endorsement of FHFA's October 20, 2014 letter (Dkt. 869), ordering the Parties to submit a joint report listing the proposed redactions to FHFA's Reply Memorandum of Law in Support of its Motion for Partial Summary Judgment on the Statute of Limitations and supporting materials in the above-captioned Actions.

The Parties have met and conferred and agree that the documents identified herein should be filed in redacted form, as described below. Consistent with Sections 2.6, 2.7, 2.8 and 9 of the First Amended Protective Order dated January 11, 2013, the Parties propose to redact or file under seal documents that contain the following categories of information: (1) personally identifiable information and (2) transcript excerpts from a regulatory investigation. There is no dispute among the parties about what materials should be redacted.

The following chart identifies the portions of exhibits for which the Parties request redaction:

<i>FHFA v. Nomura Holding America Inc.. Exhibits</i>		
Exhibit	Location of Redaction	Reason for Redaction
228	Pp. 11, 12 of PDF	Cell phone numbers
241	Tr. 112:2-20; 113:3-12; 114:2-25	Discussion and reading of the transcript from regulatory investigation

The Parties also request that the Court redact from FHFA's Reply 56.1 Statement filed in *FHFA v. Nomura Holding America, Inc.*, 11 Civ. 6201 (DLC), the highlighted information in the chart below:

<i>FHFA v. Nomura Holding America Inc.</i> , FHFA's Reply 56.1 Statement			
Paragraph	Page(s)	Text to Be Redacted (Highlighted)	Reason for Redaction
155	117-118		Regulatory Investigation

Highlighted copies of the above-listed exhibits and excerpt are being submitted to the Court via email.

Approved.
Janice C. Cole
Nov. 6, 2014

Respectfully Submitted,

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